

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.  
Technologies, a California corporation;  
MOZILLA FOUNDATION, a California  
public benefit corporation; LAURA  
CHAMBERS and her marital community;  
WINIFRED MITCHELL BAKER and her  
marital community, and DANI CHEHAK and  
her marital community,

Defendants.

Case No.: 2:24-CV-01032-RAJ

SUPPLEMENTAL DECLARATION  
OF MARICARMEN C. PEREZ-  
VARGAS IN SUPPORT OF LCR 37  
SUBMISSION

I, Maricarmen C. Perez-Vargas, am over the age of 18, have personal knowledge of all  
the facts stated herein and declare as follows:

1. The following paragraphs if this Supplemental Declaration were added in Reply.
2. Attached hereto as **Exhibit 12** is email correspondence from April 3, 2025, in  
which counsel for Plaintiff e-mailed counsel for Mozilla Corporation (“Mozilla”) requesting  
their anticipated completion date for Mozilla’s production. Mozilla’s counsel has not responded.

1           3.       Attached hereto as **Exhibit 13** is a true and correct copy of an e-mail Plaintiff  
2 produced in discovery in this matter at Bates Number TEIXEIRA\_000008. The e-mail is from  
3 Karim Lakhani, using his personal e-mail address, to Plaintiff and others.

4           4.       I am an attorney at Stokes Lawrence, P.S. and am counsel of record for Plaintiff  
5 Steve Teixeira. I submit information about fees and expenses in connection with this Motion in  
6 compliance with LCR 37(a)(2)(F) to substantiate the fees incurred by my client in obtaining  
7 lawful discovery from Mozilla Corporation, Laura Chambers, Dani Chehak, and Mitchell Baker  
8 (“Individual Defendants”) in this matter.

9           13.      My colleagues Mathew Harrington, Amy Alexander, and I are counsel of record  
10 and are the attorneys principally responsible for the fees incurred obtaining discovery. Our work  
11 on this matter was consistent with our role as counsel in a complex, multi-million dollar  
12 employment suit, and we endeavored to ensure compliance with the rules, practices, and standard  
13 of legal representation prevailing in the U.S. District Court for the Western District of  
14 Washington.

15           14.      I graduated Order of the Coif from the University of Washington School of Law  
16 in 2018. I served as an extern for Judge James L. Robart of the United States District Court for  
17 the Western District of Washington in winter 2017. I worked as an associate attorney with the  
18 Labor & Employment practice at K&L Gates before beginning work at Stokes Lawrence in  
19 2021. My practice focuses on representing employer and employee clients with advice on federal  
20 and Washington employment law issues including discrimination, wrongful termination,  
21 noncompetition and non-solicitation agreements, leave, and accommodations. I have been an  
22 attorney licensed to practice law in Washington State since 2018. My hourly rate for Seattle-

1 based matters in 2024 was \$475 and in 2025 is \$525. In 2025, I have billed \$450 per hour on the  
2 above captioned matter.

3 15. Amy Alexander is a shareholder at Stokes Lawrence. She graduated from the  
4 University of Washington School of Law in 2011 and has been licensed to practice law in  
5 Washington for nearly 14 years. Following law school, she was an AmeriCorps Equal Justice  
6 Works Legal Fellow, and later staff attorney at Northwest Justice Project's Medical-Legal  
7 Partnership. She then clerked for the Honorable Michael S. Spearman at the Washington State  
8 Court of Appeals, Division One. She has practiced law at Stokes Lawrence since 2019, and  
9 focuses exclusively on employment litigation, counseling, and investigations, with an emphasis  
10 on drafting, counseling, and litigating restrictive covenants and trade secret matters on behalf of  
11 both individuals and employers. She was selected by my peers as a "Best Lawyer - One to  
12 Watch" for Labor and Employment Law in both 2023 and 2024, and selected as a Super Lawyer  
13 in 2024. Her hourly rate for Seattle-based matters in 2024 was \$525, and in 2025 is \$575. She  
14 has billed on the above-captioned matter at an hourly rate of \$475 in 2025.

15 16. Mathew Harrington graduated from the University of Chicago Law School in  
16 2002 and has been licensed to practice law in Washington for 22 years. His practice focuses on  
17 civil commercial claims, with a particular emphasis on claims involving employment law, trade  
18 secret misappropriation, noncompete agreements, and the Washington Consumer Protection Act.  
19 He has represented clients before various state and federal trial and appellate courts, including as  
20 counsel of record in a victory before the U.S. Supreme Court. His hourly rate for Seattle-based  
21 matters in 2024 was \$700, and in 2025 is \$750. In 2025, he has billed to the above captioned  
22 matter at a rate of \$750 per hour.

23 17. Sarah Armon is a senior litigation paralegal at Stokes Lawrence. She joined  
24

1 the firm in 2008 and supports the Employment, American Indian Law, and Intellectual Property  
2 litigation practices at the firm. Ms. Armon has been the lead paralegal responsible for directing  
3 litigation support for matters at every level in Washington and in matters pending before  
4 administrative and judicial bodies throughout the United States. Her hourly rate for Seattle-based  
5 matters in 2024 was \$375 and in 2025 is \$425. In 2025, she has billed the above captioned matter  
6 at a rate of \$425 per hour.

7 18. It is my opinion that the rates billed by attorneys in this matter are commensurate  
8 with rates of attorneys with similar experience who represent clients in complex employment-  
9 related lawsuits such as this one, involving the tech industry and involving significant damages.  
10 It is my opinion that the rates billed by Ms. Armon are commensurate with rates of paralegal  
11 professionals of similar experience. This judgment is informed by my experience litigating fee  
12 petitions in the state and federal courts within this market, and also informed by the opinion of  
13 Mr. Harrington, who until several years ago served on our firm's management committee and  
14 was involved in setting rates for our firm of 60 lawyers.

15 19. The table attached hereto as **Exhibit 14** summarizes and describes certain time  
16 Stokes Lawrence, P.S. expended on Mr. Teixeira's behalf (subject to exclusions described  
17 below) and billed to him for efforts to obtain lawful discovery that is the subject of Plaintiff's  
18 first requests for discovery to Defendants Mozilla Corporation, Mitchell Baker, Laura Chambers,  
19 and Dani Chehak, and which are the subject of this motion to compel. This table was created  
20 using information from a report generated by Stokes Lawrence's accounting system that  
21 summarizes the compensable time spent by the firm for services performed on Plaintiff's behalf  
22 in connection with this lawsuit. The narratives in Exhibit 13 were drafted at or near the time the  
23 work was done, have been reviewed for accuracy by me, and, where appropriate, have been  
24

1 cross-referenced against work product and notes in our files. I excluded time entries in  
2 compliance with the Western District of Washington's lodestar method of calculating a  
3 reasonable fee award. I endeavored to err on the conservative side when deciding whether to  
4 include a particular time entry in this compilation of fees. In order to be conservative, and to  
5 exclude any time unrelated to this Motion and the discovery requests at issue herein, I have made  
6 deductions for entries that included work on unrelated issues, in addition to the removal of  
7 miscellaneous or unrelated time entries.

8         20.     The total amount of fees being requested in connection with the Motion to  
9 Compel is \$14,262.50.

10         I declare under penalty of perjury under the laws of the United State of America that the  
11 foregoing is true and correct

12         DATED this 8<sup>th</sup> day of April, 2025.

13                                 STOKES LAWRENCE, P.S.

14                                 By: /s/Maricarmen Perez-Vargas  
15                                 Maricarmen Perez-Vargas